

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

JUAN JOSÉ PERAZA MORA  
GLORIA E. BATISTA MOLINA  
d/b/a Vaquería Peraza  
XXX - XX - 9523  
XXX - XX - 1026  
Debtors

CASE NO. 19-01896-ESL12

CHAPTER 12

**Motion Submitting Stipulation for the Treatment of Claim for Secured Creditor, Triangle Cayman Asset Company**

**TO THE HONORABLE COURT:**

**Come Now**, the Debtors Juan J Peraza Mora and Gloria E Batista Molina, through the undersigned counsel of record and very respectfully STATE and PRAY:

1. The Debtors filed the present Chapter 12 Bankruptcy Case on April 5, 2019 under case no. 19-01896-ESL12.
2. This Honorable Court entered an Order allowing the Debtors and Triangle Cayman Asset Company up to May 7, 2020 to submit a Settlement Agreement. See Order at Docket No. 146.
3. The parties submit the Settlement Agreement for the treatment of secured creditor, Triangle Cayman Asset Company, attached to this motion as **EXHIBIT 1**.

WHEREFORE it is respectfully requested that this Honorable Court approves the Stipulation submitted at Exhibit 1.

RESPECTFULLY SUBMITTED,

In Mayaguez, Puerto Rico this April 23, 2020

**Within twenty one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerks office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.**

#### **CERTIFICATE OF SERVICE**

Notice of this MOTION has been electronically provided by the CM/ECF system to: The **US Trustee** for the District of Puerto Rico, The Chapter 12 Trustee JOSE CARRION and to all attorneys and Creditors that have filed a notice of appearance. The non-CM/ECF participants will be notified by first class mail as per the Master Address List included herein.

Homel A. Mercado Justiniano, Esq.  
*Attorney for Debtors*  
Calle Ramirez Silva #8  
Ensanche Martínez,  
Mayaguez, PR 00680  
Tel: (787) 831-2577/ 805-2945  
Fax: (787)805-7350

*S/Homel A. Mercado-Justiniano*  
USDC - PR 229705  
hmjlaw2@gmail.com  
hmjlaw@yahoo.com